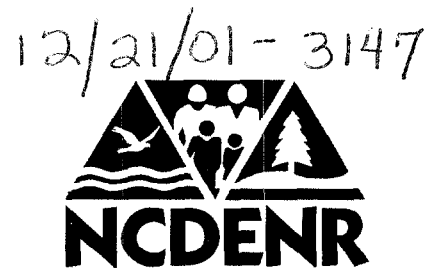


**NORTH CAROLINA
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT**

**MICHAEL F. EASLEY, GOVERNOR
WILLIAM G. ROSS, JR., SECRETARY
DEXTER R. MATTHEWS, INTERIM DIRECTOR**

December 21, 2001



Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street (Building N-26)
Norfolk, Virginia 23511-2699

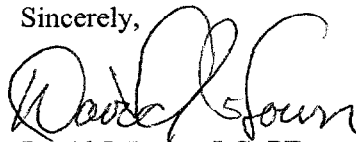
Attention: Mr. Kirk Stevens
Navy Technical Representative
Code EV23

RE: NC Comments Site 84
Draft Non-Time Critical Removal Action
MCB Camp Lejeune

Dear Mr. Stevens:

The North Carolina Superfund Section has reviewed this document and our comments are attached. If you have any questions, please call.

Sincerely,



David J. Lown, LG, PE
Geological Engineer
Superfund Section

Attachment

cc: Gena Townsend, USEPA
Neal Paul, MCB Camp Lejeune

NC Superfund Comments
Non-Time Critical Removal Action, Building 45, Site 84
December 21, 2001

In reference to Table 1:

1. The column labeled "SSL" is based on North Carolina criteria and not Region IX as indicated in the table.
2. The NC SSL for chrysene is 39,800 ug/kg.
3. Numbers for SSLs missing from the NC screening tables should be calculated. Below are the numbers calculated using the NC Hazardous Waste Section, SSL guidance:

Benzo(b)fluoranthene	1,160 ug/kg
Benzo(k)fluoranthene	11,600 ug/kg

4. Residential PRGs that are missing from Table 1 can be calculated using risk-based calculations.
5. As indicated in Table 1, the most stringent criteria should be used; however, if the spill is older than 1980 and groundwater is not contaminated, then the SSL does not have to be used for clean-up. Residential PRGs would be the correct clean-up criteria. Is there reason to suspect that the compounds for which SSL criteria have been selected are leaching to the groundwater?